

FILED\* US Bankruptcy Court-437  
JUL 14 2025 4:03

Ammon E. Bundy  
P.O. Box 1062  
Cedar City, Utah 84720  
208-872-4030

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH**

**In re:**

**AMMON EDWARD BUNDY,**

**Case No.: 24-23530  
Chapter 7  
William T. Thurman**

***AC #: 24-02130***

**NOTICE OF INTENT TO OFFER TRIAL AUDIO AND RELATED EVIDENCE  
IN RESPONSE TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Defendant Ammon Bundy hereby gives notice of intent to introduce trial audio and related materials in connection with the Court's hearing scheduled for July 16, 2025, on Plaintiffs' Motion for Summary Judgment. These materials are relevant to refute and clarify factual assertions made by Plaintiffs regarding an allegedly threatening video statement presented at the Idaho state court trial in *St. Luke's v. Bundy, Rodriguez*, Case No. CV01-22-06789.

The attached audio was obtained from the official transcript coordinator of the Ada County Court and includes the actual courtroom discussion concerning the video in question. It demonstrates that a materially altered version of Ammon Bundy's statement was presented by Plaintiffs during the Idaho trial. These alterations created a false and misleading impression of Mr. Bundy's words and intent.

This evidence is offered under Federal Rules of Evidence 1002 (Best Evidence Rule), 1005 (Copies of Public Records), and 106 (Rule of Completeness), and should be considered as part of the summary judgment record under Fed. R. Civ. P. 56(c) (incorporated by Fed. R. Bankr. P. 7056)

*12*

**The following exhibits are submitted:**

- **Exhibit C** – Audio Clip: Edited Video Presentation at Trial (Excerpt from Court-Provided Audio) (Previously Submitted)
- **Exhibit S** – Email from Pamela Bourne, Ada County Transcript Coordinator (Confirming Court Delivery of Audio)
- **Exhibit T**– Receipt for Audio Purchase (Ada County Trial Court)
- **Exhibit U** – Transcript Comparison of Original vs. Altered Video Statements
- **Exhibit V** – Declaration of Ammon Bundy Regarding Evidence Submission and Authenticity

The audio clip identified as Exhibit C is being re-submitted to the Court on a USB jump drive due to its file size and format. A copy of the same exhibits are being served on Plaintiffs' counsel. Defendant requests that the Court accept the physical media as part of the evidentiary record for purposes of the upcoming hearing.

This Notice is limited to the trial audio and related authentication materials (Exhibits C and S-V). Defendant respectfully incorporates by reference all previously submitted exhibits attached to his Opposition to Plaintiffs' Motion for Summary Judgment, DATED: June 12, 2025, including Exhibits A - Q, and does not resubmit them entirely here.

Respectfully submitted, DATED: July 10, 2025

A handwritten signature in black ink, appearing to read 'Ammon Bundy', with a stylized, flowing script.

**Ammon Bundy**

I certify that on this day I served a copy of the attached to:

UNITED STATES BANKRUPTCY COURT, DISTRICT OF UTAH

350 S Main St, Salt Lake City, UT 84101 [X] USPS

Mark C. Rose, Trustee [mrose@mbt-law.com](mailto:mrose@mbt-law.com) [X] Email

Erik Stidham [efstidham@hollandhart.com](mailto:efstidham@hollandhart.com) [X] Email

Exhibit C (audio file) was re-served on Plaintiffs' counsel via upload to a Holland & Hart link.

**DATED THIS DAY**, the 10<sup>th</sup> of July, 2025.

A handwritten signature in black ink, appearing to read "A. Bundy", with a large, sweeping flourish extending from the left side.

Ammon Bundy

**Exhibit C** – Audio Clip: Edited Video Presentation at Trial (Excerpt from Court-Provided Audio)

**Exhibit C: Edited Video Version Presented at Trial**

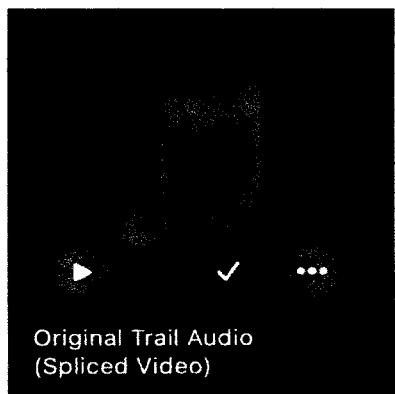


Exhibit provided on a USB drive labeled:

"Exhibit - Video Files Supporting Opposition to Summary Judgment"

**Exhibit S – Email from Pamela Bourne, Ada County Transcript Coordinator (Confirming Court Delivery of Audio)**

**RE: RE: [EXTERNAL] Transcript Request - CV01-22-06789 St. Luke's v Bundy/Rodriguez**

From TCA Transcript Department <transcripts@adacounty.id.gov>  
To Freedom Man Press<freedommanpress@protonmail.com>  
Date Monday, September 25th, 2023 at 3:46 PM

WOW I think we crossed e-mails.

You should have the link to your audio now.

Pamela Bourne  
Transcripts Coordinator  
Ada County Courthouse  
200 W. Front Street, Ste. 4172  
Boise, ID 83702  
208-287-7512  
transcripts@adacounty.id.gov

From: Freedom Man Press <freedommanpress@protonmail.com>  
Sent: Monday, September 25, 2023 1:38 PM  
To: TCA Transcript Department <transcripts@adacounty.id.gov>  
Subject: Fw: RE: [EXTERNAL] Transcript Request - CV01-22-06789 St. Luke's v Bundy/Rodriguez

Hello Pamela -

Can you please confirm that you received this email/order and will be sending me the audio transcripts soon? Thank you!

Diego Rodriguez  
Freedom Man Press

----- Forwarded Message -----

From: Freedom Man Press <freedommanpress@protonmail.com>  
Date: On Thursday, September 21st, 2023 at 12:35 PM  
Subject: RE: [EXTERNAL] Transcript Request - CV01-22-06789 St. Luke's v Bundy/Rodriguez  
To: TCA Transcript Department <transcripts@adacounty.id.gov>

Hello Pamela -

I've attached the receipt. Please forward me the audio transcripts for the entire court case for Case CV01-22-06789 as noted below. The case began on July 10th - July 21st, 2023.

Case name — St. Luke's Hospital vs. Diego Rodriguez

Case number — CV01-22-06789

Hearing date — June 10, 2023

Judge name — Judge Nancy Baskins

Diego Rodriguez

Freedom Man Press

----- Original Message -----

On Tuesday, August 1st, 2023 at 11:25 AM, TCA Transcript Department <transcripts@adacounty.id.gov> wrote:

Hello Diego,

The requested audio copy, 8 days of Jury Trial and 1 day pre-trial is \$477.75. You can pay by credit card on the following link

[https://www.adacountyid.gov/Transcripts/TranscriptRequest.aspx](#). Payments > \$80 the convenience fee will be 2.4% of the cost of the copies and will be added to your total.

Payment Type is Transcript office, County is Ada.

*Forward your receipt back to the Transcripts@adacounty.id.gov.*

Once we receive your forwarded receipt, we will send a link to you. The link will prompt a confirmation e-mail, and that e-mail may show up in your junk/spam folder. Access to copy or download your audio is 10 days.

The estimated cost for a written transcript of the same dates of hearing you will contact the Official Court Reporter who covered. Christie Valich was the Court Reporter who covered the 8 day trial, her contact e-mail is [crvalich@adacounty.id.gov](mailto:crvalich@adacounty.id.gov). The pretrial conference was covered by Susan Sims Official Court Reporter and her contact e-mail is [ssims@adacounty.id.gov](mailto:ssims@adacounty.id.gov).

Thank you,

Pamela Bourne

Transcripts Coordinator

Ada County Courthouse

200 W. Front Street, Ste. 4172

Boise, ID 83702

208-287-7512

transcripts@adacounty.id.gov

**From:** Freedom Man Press <freedommanpress@protonmail.com>  
**Sent:** Tuesday, July 25, 2023 4:20 PM  
**To:** TCA Transcript Department <transcripts@adacounty.id.gov>  
**Subject:** [EXTERNAL] Transcript Request

**CAUTION:** This email originated from outside Ada County email servers. Do not click on links or open attachments unless you recognize the sender and know the content is safe. Verify the sender by mouse-hovering over their display name in order to see the sender's full email address and confirm it is not suspicious. If you are unsure an email is safe, please report the email by using the 'Phish Alert' button in Outlook.

Hello Pamela -

I am requesting the audio and transcription for the entire case beginning on July 10th - July 21st 2023.

Case name — St. Luke's Hospital vs. Diego Rodriguez

Case number —CV01-22-06789

Hearing date – June 6, 2023

Judge name – Judge Nancy Baskins

Diego Rodriguez

Freedom Man Press

**Exhibit T– Receipt for Audio Purchase (Ada County Trial Court)**

9/21/23, 12:33 PM

Ada County Trial Court



**Step 3: Confirmation and Receipt**

**Result: Payment Authorized**  
**Confirmation Number: 142927862**

Your payment has been authorized successfully and payment will be processed.

Ada County thanks you for your payment. For questions about your account, please call 208-287-7500 Thank you for using our bill payment services.

Please save or print a copy of this receipt for record keeping purposes.

**My Bills**

Transcripts office payment of \$477.75 on Case Number CV01-22-06789		\$477.75
<b>Customer Information</b>		<b>Subtotal:</b> \$477.75
First Name: Diego		<b>Convenience Fee:</b> \$11.47
Last Name: Rodriguez		<b>Total Payment:</b> \$489.22
Address Line 1: 1317 Edgewater Dr		
Address Line 2: #5077		
City: Orlando		
State: Florida		
Zip Code: 32804		
Phone Number: 2088917728		
Email Address: freedommanpress@protonmail.com		

**Payment Information**

Payment Date: 09/21/2023  
Card Type: American Express  
Card Number: \*\*\*\*\*003



**Exhibit U – Transcript Comparison of Original vs. Altered Video Statements**

**ORIGINAL:**

I have to say that I'm not okay with any of this. To be honest with you, if justice was to be served, we would go into the hospital, take that baby, and we'd give it back to their mother. And then if we were further to administrate justice, we would find those that are accountable and we would uh prosecute them, and uh, and uh, you know, make them uh, pay, for the damages that they caused to this family and assure that this never happens again.

That's what should happen. And uh, I will say this, that I'm not alone in those feelings, but uh we also have had to suppress those uh those thoughts and actions uh because we are trying to give the people that are uh, making the decisions that are doing this thing to them—give them a chance to correct this issue so that we don't have to do it for them...

**ALTERED VIDEO:**

...if justice was to be served, we would go into the hospital, take that baby, and we'd give it back to their mother. And then if we were further to administrate justice, we would find those that were accountable and we would uh prosecute them, and uh, and uh, you know, make them uh, pay, I know that there are groups, uh patriot groups, that have wanted to come. And uh, and just do what needs to be done...

**Exhibit V – Declaration of Ammon Bundy Regarding Evidence Submission and Authenticity**

Ammon E. Bundy  
P.O. Box 1062  
Cedar City, Utah 84720  
208-872-4030

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH**

**In re:**

**AMMON EDWARD BUNDY,**

**Case No.: 24-23530  
Chapter 7  
William T. Thurman**

**DECLARATION OF AMMON BUNDY IN SUPPORT OF ADMISSIBILITY OF  
TRIAL AUDIO**

I, Ammon Bundy, hereby declare as follows:

1. I am the named defendant in the above-captioned adversary proceeding. I make this declaration in support of my opposition to Plaintiffs' Motion for Summary Judgment and to authenticate the attached trial audio and related materials.
2. In September 2023, trial audio recordings were obtained by Diego Rodriguez, a co-defendant in the related Idaho civil litigation (*St. Luke's v. Bundy, Rodriguez*, Case No. CV01-22-06789), directly from the Ada County Court Transcript Office. These recordings were ordered, paid for, and delivered by the official court transcript coordinator, Pamela Bourne.
3. Exhibit C is a true and correct excerpt from those official trial audio recordings, containing relevant portions of the proceedings in which the Plaintiffs referenced and presented a video containing my alleged statements.
4. Exhibit S is a true and correct copy of the confirmation email from Pamela Bourne verifying that the audio was provided by her office.
5. Exhibit T is a true and correct copy of the receipt confirming Diego Rodriguez's payment to the Ada County Court for the trial audio.

6. Exhibit U is a comparison transcript that shows my actual spoken statements versus the edited version that was presented by the Plaintiffs during the Idaho trial. The comparison reveals that my statements were altered in a misleading way by removing key contextual language and splicing video content to change the intent of my message.
7. These materials are submitted to demonstrate that the Plaintiffs presented a materially false version of my statements during trial in Idaho, and that there remains a genuine dispute of material fact regarding the credibility of that evidence.
8. I respectfully ask that the Court accept this evidence into the record as part of the summary judgment proceedings, or alternatively at an evidentiary hearing, pursuant to Federal Rules of Evidence 1002, 1005, and 106.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 10 day of July, 2025. New Harmony, Utah

A handwritten signature in black ink, appearing to read "Ammon Bundy", written in a cursive style.

**Ammon Bundy**

I certify that on this day I served a copy of the attached to:

UNITED STATES BANKRUPTCY COURT, DISTRICT OF UTAH

350 S Main St, Salt Lake City, UT 84101

☒ USPS

Mark C. Rose, Trustee

[mrose@mbt-law.com](mailto:mrose@mbt-law.com)

☒ Email

Erik Stidham

[efstidham@hollandhart.com](mailto:efstidham@hollandhart.com)

☒ Email

DATED THIS DAY, the 10<sup>th</sup> of July, 2025.

A handwritten signature in black ink, appearing to read "A. Bundy", with a stylized flourish at the end.

Ammon Bundy